

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MONTI J. CASTANEDA,

Plaintiff,

-against-

INSTITUTE OF INTERNATIONAL  
EDUCATION, INC., JOAN WALL and MARY  
KIRK,

Defendants.

Index No. 1:08-cv-4491 (BSJ)(AJP)

**PLAINTIFFS' INITIAL  
DISCLOSURES PURSUANT TO  
RULE 26(a)(1) OF THE FEDERAL  
RULES OF CIVIL PROCEDURE**

**PLAINTIFF'S INITIAL DISCLOSURES**

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Plaintiff Monti J.

Castaneda hereby provides the following initial disclosures:

**I. EACH INDIVIDUAL LIKELY TO HAVE DISCOVERABLE INFORMATION**

To date, Plaintiff has identified the following individuals who may have discoverable information that Plaintiff may use to support its claims and defenses in this case. Depending on the results of discovery and on the evidence introduced at trial, Plaintiff reserves the right to introduce further witnesses at trial.

Aimee Tschopp	IIE, 809 United Nations Plaza, New York, NY 10017	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Amanda Ernst		This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.

Ana Holz	IIE, 809 United Nations Plaza, New York, NY 10017	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Arthur Austin	IIE, 809 United Nations Plaza, New York, NY 10017	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Betsy Glans	IIE, 809 United Nations Plaza, New York, NY 10017	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Biiftu Abajebel	IIE, 809 United Nations Plaza, New York, NY 10017	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Carl De Angelis	IIE, 809 United Nations Plaza, New York, NY 10017	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Carol Martino		This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Carol Tegen	No longer at IIE (home: P.O. Box A, Hightstown, NJ 08520)	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Dr. Allan E. Goodman	IIE, 809 United Nations Plaza, New York, NY 10017	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Elaine Arko	IIE, 809 United Nations Plaza, New York, NY 10017	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Emile Bosio	IIE Denver, CO	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other

		unlawful conduct and damages.
Georgette Gelormine		This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Grace Asphall	IIE, 809 United Nations Plaza, New York, NY 10017	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Jaye Chen	IIE, 809 United Nations Plaza, New York, NY 10017	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Jeanne Mchuge	No longer at IIE (home: 240 Alpine Place, Crestwood, NY)	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Johanna Marquina	IIE, 809 United Nations Plaza, New York, NY 10017	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Johanne Wilke		This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Judith Adler	LASPAU	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Karen De Bartolome	IIE Denver, CO	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Kari Kuja	IIE, 809 United Nations Plaza, New York, NY 10017	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.

Kate Bradley		This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Kathleen Sullivan	IIE, 809 United Nations Plaza, New York, NY 10017	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Linda Tobash	IIE, 809 United Nations Plaza, New York, NY 10017	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Maribel Garcia-Moreno	IIE, 809 United Nations Plaza, New York, NY 10017	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Marie Ward		This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Mark Neighbors		This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Michele A. Wheeler	24 East 12th Street New York, NY 10003	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Midalia Velez		This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Nancy Kong	No longer at IIE(home:170 Park Row, 322A, New York, NY10038)	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Nancy Mills	IIE, 809 United Nations Plaza, New York, NY	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other

	10017	unlawful conduct and damages.
Nora Yepes	IIE, 809 United Nations Plaza, New York, NY 10017	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Peggy Blumenthal	IIE, 809 United Nations Plaza, New York, NY 10017	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Rachel Goldberg	IIE, 809 United Nations Plaza, New York, NY 10017	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Rosita Veluya	IIE, 809 United Nations Plaza, New York, NY 10017	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Sarah Ilchman	IIE, 809 United Nations Plaza, New York, NY 10017	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Sarah Mott		This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Schyuler Allen	IIE, 809 United Nations Plaza, New York, NY 10017	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Tatiana Mackliff	IIE, 809 United Nations Plaza, New York, NY 10017	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Therese Workman		This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.

Tina Ravitz		This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Tony Claudino	IIE, 809 United Nations Plaza, New York, NY 10017	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Varinia Granhum		This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Kate De Boer, Director, Foreign Fulbright Priograms	AMIDEAST 1730 M Street, NW, Suite 1100, Washington DC 20036	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Jack Bailey	CIES Deputy Executive Director 3007 Tilden Street, NW Suite 5L, Washington DC, 20008	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Ned Strong	LASPAU - 25 Mount Auburn Street, Cambridge, MA 02138	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Judith Adler	LASPAU - 25 Mount Auburn Street, Cambridge, MA 02138	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Renee-Hahn-B urke	LASPAU - 25 Mount Auburn Street, Cambridge, MA 02138	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Sonia Wallenberg	LASPAU - 25 Mount Auburn Street, Cambridge, MA 02138	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.

Edward Moks	IIE 809 UN Plaza, NY NY 10017, (212)984-5494	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Leigh Sours	US Department of State/ECA	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.
Thomas Farrell	Deputy Assistant Secretary of State, US Department of State	This person has information about matters at issue in this lawsuit, including but not limited to the Institute Of International Education, Inc.'s discriminatory practices, harassment, retaliation, and other unlawful conduct and damages.

## II. DOCUMENTS, DATA COMPILATIONS, AND TANGIBLE THINGS

Plaintiff's investigation is continuing, and it is likely that it will learn of additional documents that it may use to support her claims or defenses. Additional documents will be made available as soon as practicable as efforts are continuing to locate, identify and copy documents for purposes of disclosure. Subject to these qualifications, Plaintiff identifies the following documents that they may use to support their claims or defenses. These documents include: Correspondence between counsel for plaintiff and defendant, Correspondence between plaintiffs and defendant, Documents relating to the training and promotion of the Monti Castaneda. Plaintiff has information stored in the form of computer data that is likely to bear on claims and defenses raised in this case. Plaintiff will provide this information subject to applicable confidentiality laws as soon as a mutually agreeable method for production of the data can be worked out.

All documents are in the possession of Plaintiff at 34-59 89 Street, Jackson Heights, New York 11372 or her counsel at 305 Madison Avenue, Suite 449, New York, NY 10165.

### **III. COMPUTATION OF DAMAGES**

This suit is intended to recover damages suffered by Monti J. Castaneda for the conduct set forth in the Complaint. Plaintiff's damages include damages consisting of back pay, compensatory and punitive damages by reason of defendant's actions, in an amount yet to be determined, plus any applicable attorneys' fees and costs. These initial assumptions are subject to continuing analysis and will be revised or supplemented if and as necessary. Certain assumptions and calculations are likely to change as additional information is accumulated. Since past damages are increasing daily, these damages will continue to increase. The Plaintiff has asked for the recovery of attorney's fees and costs, which will be calculated as the case progresses.

Plaintiff's investigation and discovery concerning this case is continuing, and if additional information is obtained after the date of these disclosures, plaintiff will provide supplemental disclosure.

Dated: New York, New York

August 15, 2008

Respectfully submitted,

**MEJIA LAW FIRM LLC**

By s/ Gerardo Mejia

GERARDO E. MEJIA (GM 0128)  
305 MADISON AVENUE, SUITE 449  
NEW YORK, NY 10165  
Phone: (212) 924-9244  
Fax: (888) 864-8580

ATTORNEY FOR PLAINTIFF MONTI J. CASTANEDA



**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Plaintiff's Rule 26(a)(1) Initial Disclosures was served by regular U.S. mail, upon Michele A. Coyne at 950 Third Avenue New York, New York 10022, this 15th day of August 2008.

I further certify that on this 15th day of August 2008, I electronically filed the foregoing PLAINTIFF'S INITIAL DISCLOSURES with the Clerk of Court using the CM/ECF system.

s/ Gerardo Mejia

GERARDO E. MEJIA

ATTORNEY FOR PLAINTIFF MONTI J. CASTANEDA